

# EXHIBIT 1

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

MINA DE ORO, LLC, a Nevada limited liability company; THE TOY CHEST, LLC a Nevada limited liability company,

Plaintiffs,

v.

MATTHEW BRENT GOETTSCHE, an individual, JOBEDIAH SINCLAIR WEEKS, an individual, JOSEPH FRANK ABEL, an individual, SILVIU CATALIN BALACI, an individual, BITCLUB, an unknown entity, and DOE and ROE Corporations,

Defendants.

Case No: 2:20-cv-00994

**DECLARATION OF P. STERLING KERR, ESQ. IN SUPPORT OF APPLICATION FOR DEFAULT JUDGMENT AGAINST DEFENDANT JOSEPH FRANK ABEL**

I, P Sterling Kerr, Esq. declare:

1. I am the counsel for Plaintiffs in this matter and am competent to testify as to the matter set forth herein.

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2. I am familiar with the facts of this case and after careful investigation in the cause and has been informed and believes that Joseph Frank Abel is not in the military service of the United States, nor an infant, nor an incompetent person.

FURTHER DECLARANT SAYETH NAUGHT

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

DATED this 18<sup>th</sup> day of November, 2022.



P Sterling Kerr, Esq.